

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ENDO PHARMACEUTICALS INC.,  Plaintiff,  v.  RANBAXY LABORATORIES LTD., RANBAXY INC., AND RANBAXY PHARMACEUTICALS INC.,  Defendants.	C.A. No. 13-cv-8597-TPG       C.A. No. 13-cv-4343-TPG
ENDO PHARMACEUTICALS INC.,  Plaintiff,  v.  ROXANE LABORATORIES, INC.,  Defendant.	C.A. No. 13-cv-3288-TPG

**DECLARATION OF REZA FASSIHI, Ph.D.**

I, Reza Fassihi, hereby declare under penalty of perjury as follows:

1. I am a citizen and resident of the Commonwealth of Pennsylvania, I am over the age of 21 years, and I suffer from no mental or physical infirmities that would render me incompetent to make this declaration. I have personal knowledge of the matters set forth in this declaration.

2. I am a pharmacist by training and have been training pharmacy student and pharmacists for decades. I have a Bachelor of Pharmacy degree from Punjab University, as well as a doctorate degree in Pharmaceutics from the School of Pharmacy at Brighton University in England. I am currently employed as a professor of Biopharmaceutics and Industrial Pharmacy

at Temple University School of Pharmacy in Philadelphia, Pennsylvania. In that role, I have taught and trained close to 3,000 students seeking to obtain a Pharm.D. (i.e., Pharmacy Doctorate degree), which would entitle them to practice as a pharmacist. I have been teaching pharmacy and other pharmaceutical sciences to graduate students, pharmacists, and medical students, and conducting research in those areas for the past 30 years. Attached as Exhibit A is a copy of my *curriculum vitae*.

3. One of the principal roles of a pharmacist is to consult with and advise patients as well as physicians and other health care professionals regarding the proper dosage and administration of medications, including the selection of appropriate dosage forms, strengths of drugs, and usages of medications.

4. In my role as a professor of biopharmaceutics and industrial pharmacy, as well as a consultant to various companies regarding pharmaceutical drug development, I review product labels, package inserts, and information in the *Physicians' Desk Reference* (commonly referred to as the "PDR") on a regular basis. The PDR is a compilation of manufacturers' prescribing information from the package inserts of prescription drugs. I am intimately familiar with the contents of product labels and package inserts and how to interpret their contents. Based upon my educational background and over 30 years of experience in the fields of pharmacy and other pharmaceutical sciences, I believe that I am proficient at reading and interpreting package inserts and product labels.

5. My role as a pharmaceutical scientist involves advising and assisting health care professionals, including physicians, to ensure that patients receive the proper dosage of a drug. A principal responsibility of pharmacists is to ensure that patients receive a safe and effective dose of drugs prescribed by doctors. It is not uncommon for a pharmacist to read a

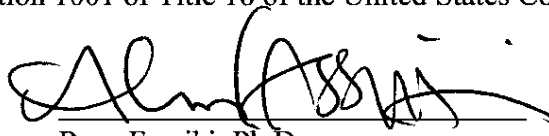
physician's prescription and communicate with the physician to correct or modify the course of treatment in light of the prescribing information embodied in the prescribed drug's package insert and the medication guide. I personally have contacted physicians where I thought a prescription would not provide an effective dosage form for a patient in light of the drug's prescribing information. It is common for pharmacists to explain to patients prescribing instructions, including those described on package inserts and medication guides provided with prescription drugs.

6. Physicians at Temple University Hospital and other hospitals in the Philadelphia area contact me on a regular basis to seek my advice on selection of different dosage forms and their strengths, as well as usages of the medications for their patients.

7. As a professor of Biopharmaceutics and Industrial Pharmacy at Temple University School of Pharmacy I teach my pharmacy students to serve as partners to physicians, nurses, and other health care professionals. This includes working with health care professionals to ensure that patients receive appropriate dosing of prescription drugs like Opana® ER. Additionally, I lecture medical students on pharmaceutical dosage forms, including concerning issues relating to pharmacokinetics and pharmacodynamics of drugs.

I declare that all statements made herein are true and further, that these statements are made with the knowledge that willful, false statements and the like so made are punishable by fine or imprisonment or both, under Section 1001 of Title 18 of the United States Code.

Dated: March 13 , 2015



Reza Fassihi, Ph.D.